

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARSH USA LLC,

Plaintiff,

v.

AON RISK SERVICES COMPANIES, INC.,
ROBERT MCDONOUGH, and DANNY
HALL,

Defendants.

No. 1:25-cv-03241-JAV-HJR

**NOTICE OF DEFENDANTS'
MOTION TO DISMISS**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Declaration of Joshua A. Dunn, Esq., and Exhibit A thereto, and all other papers and proceedings in this action, Defendants Aon Risk Services Companies, Inc. (“Aon”), Robert McDonough (“McDonough”), and Danny Hall (“Hall” and, together with Aon and McDonough, “Defendants”), by their undersigned attorneys, will move this Court before the Hon. Jeannette A. Vargas, United States District Judge for the Southern District of New York, for an Order dismissing with prejudice the Amended Complaint [ECF No. 18] in its entirety for failure to state a claim upon which relief can be granted, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and granting Defendants such other and further relief as the Court may deem just and proper.

Defendants intend to serve reply papers in further support of this motion in order to address any opposition filed by Plaintiff, Marsh USA LLC (“Marsh”). Defendants request oral argument on this motion.

Dated: July 11, 2025
New York, New York

Respectfully submitted,

VEDDER PRICE P.C.

O'MELVENY & MYERS LLP

By: /s/ Joshua A. Dunn

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